

EXHIBIT 2

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)	
)	
<i>Plaintiff,</i>)	
)	No. 3:23-cv-00243
v.)	
)	JUDGE RICHARDSON
SOUTHERN BAPTIST CONVENTION;)	MAGISTRATE JUDGE FRENSELY
GUIDEPOST SOLUTIONS LLC; and)	
EXECUTIVE COMMITTEE OF THE)	JURY DEMAND
SOUTHERN BAPTIST CONVENTION,)	
)	
<i>Defendants.</i>)	

**PLAINTIFF'S RESPONSES TO THE EXECUTIVE COMMITTEE'S
FIRST SET OF REQUESTS FOR ADMISSION, FIRST SET OF INTERROGATORIES
AND FIRST SET OF REQUESTS FOR PRODUCTION TO PLAINTIFF**

Plaintiff, by counsel, hereby provides his responses to Defendant Executive Committee of the Southern Baptist Convention's First Set of Requests for Admission, First Set of Interrogatories, and First Set of Requests for Production:

GENERAL OBJECTIONS

To avoid undue and unnecessary repetition, each of the following responses is made subject to and incorporates the following general objections:

1. Plaintiff objects to the requests to the extent they seek to require the disclosure of information or the production of documents that are beyond the scope of permissible discovery under the Federal Rules of Civil Procedure.

2. Plaintiff objects to the requests to the extent they seek to impose discovery burdens or responsibilities upon Plaintiff beyond those specifically required by the Federal Rules of Civil

RESPONSES TO FIRST SET OF INTERROGATORIES

INTERROGATORY NO. 1:

Identify every person with knowledge of facts relevant to the claims, defenses, and/or matters set forth in the Complaint. In Your answer, please state the relevant information each person possesses.

ANSWER:

- [REDACTED] – facts relating to the encounter; communications with Plaintiff; communications with Roy Blankenship; communications with Guidepost
- [REDACTED] - communications with Plaintiff; communications with Roy Blankenship; communications with Guidepost
- Samantha Kilpatrick, Guidepost Senior Managing Director – creation and publication of the Report
- Russell Holske, Guidepost Senior Managing Director – creation and publication of the Report
- Janet Hunt, Spouse – communications with [REDACTED] and Roy Blankenship
- Roy Blankenship – communications with Plaintiff, [REDACTED], and Janet Hunt
- Kevin Ezell, NAMB President – communications with Plaintiff about the Report; Plaintiff's loss of employment
- Jeremy Morton, Pastor at First Woodstock and SBC Executive Committee Member – communications with Plaintiff about the Report; Plaintiff's loss of title with the church
- Jim Law, Former Associate at FBCW and employee of NAMB – communications about the Report
- Matt Lawson, Staff member of FBCW – communications with Plaintiff after the Report's publication
- Stephen and Jennifer Kyle, Plaintiff's Pastor and wife at Hiland Park Baptist Church, Panama City, FL and Part of the Accountability/Restoration Group – communications with Plaintiff after the Report's publication; Plaintiff's resulting harm
- Other members of the Accountability/Restoration Group:
 - Benny Tate, Pastor of Rock Springs Church, Milner, GA – communications with Plaintiff after the Report's publication; Plaintiff's resulting harm
 - Mark Hoover, Pastor of New Spring Church, Wichita, Kansas – communications with Plaintiff after the Report's publication; Plaintiff's resulting harm

- Mike Whitson, Pastor of Indian Trail Church, Indian Trail, NC – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Steve and Vickie Flockhart, Pastor New Season Church, Hiram, GA – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Jennifer and Caleb Duncan, friends – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Mike Orr, Pastor of First Baptist Church, Chipley, FL – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Scott and Millie White, former Associate at FBCW/ Pastor of Windmark Church, St. Joe, FL – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Eddie and Terrie Carswell – communications with Plaintiff after the Report’s publication
- Sarah Hill – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Ginger and Ron Anspaugh – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- John and Denise Kisse – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Plaintiff’s Children and Spouses:
 - Deanna and Jake Carswell – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
 - Hollie and Pete Hixson – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Plaintiff’s Grandchildren:
 - Addie Hixson – communications with Plaintiff after the Report’s publication
 - Katie and Nich Oswald – communications with Plaintiff after the Report’s publication
 - Carson Carswell – communications with Plaintiff after the Report’s publication
- Spiritual Care Team from Woodstock First Baptist Church:
 - Jeremy Morton, Pastor and member of SBC Executive Committee – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
 - James Eubanks, staff member of FBCW – communications with Plaintiff after the Report’s publication
 - Jim Woodward, lay leader – communications with Plaintiff after the Report’s publication

- Alan Gotthardt, lay leader – communications with Plaintiff after the Report’s publication
- Todd Thrasher, lay leader – communications with Plaintiff after the Report’s publication
- Counselor at OnSite Ministries: Austin Houghealing – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Counselors: David & Teresa Ferguson, Relational Care, Austin, TX – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Shane Pruitt – communications with Plaintiff after the Report’s publication
- Carl Lietz (Plaintiff’s attorney) – privileged
- David Bouchard (Plaintiff’s attorney) – privileged
- Johnnie Moore (publicist) – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Jason Nave (friend) – communications with Plaintiff after the Report’s publication; Plaintiff’s resulting harm
- Bart Barber – his statements about Plaintiff and the Report
- Members of the Task Force and Committee on Cooperation – review of the Report prior to publication and decision publish allegations against Plaintiff
- Members of the Credentials Committee – attempts to prevent churches from associating with Plaintiff

VERIFICATION OF JOHNNY M. HUNT

STATE OF Georgia
COUNTY OF Cherokee

I, Johnny M. Hunt, after first being duly sworn, state as follows:

My name is Johnny M. Hunt. The answers to the Executive Committee's First Set of Interrogatories are true and correct.

Johnny M. Hunt
Johnny M. Hunt

Sworn to and subscribed before me on this the 14 day of October, 2023.

Notary Public: Kay Covey
My Commission Expires: 03/20/2025



Dated: October 16, 2023

/s/ Patrick J. Sanders

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on October 16, 2023, on the following counsel via email only:

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